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December 18, 2023

Via ECF

Hon. Mag. Judge Robert W. Lehrburger
U.S. District Court Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
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Re: *Altaune Brown v. Essex Convenience Corp., Shahmaz Essex, LLC*
and Mark Essex, LLC,
Docket #: 1:23-cv-8419

Dear Honorable Mag. Judge Robert W. Lehrburger

This Office represents the Defendant, ESSEX CONVENIENCE CORP., I am writing to request an adjournment of the initial conference scheduled for January 10, 2024, at and an extension for filing a responsive pleading to the Complaint filed by Plaintiff, because Defendant is compiling records and other documents which pertain to the answer.

Here, the Defendant respectfully request the date to file be extended to January 17, 2024, with the Defendant, ESSEX CONVENIENCE CORP waiving personal jurisdiction defenses. This is the Defendant's first request for an extension for response to file an answer. The Defendant obtained the Plaintiff's consent to the requested extension.

Per the Court's individual part rules, this request for an adjournment we must provide multiple dates that all parties are available After conferring with counsel, the parties, through their counsel, are available on the following dates for the initial conference.: January 17, 2024, February 7, 2024, or February 14, 2024.

Thank you in for your attention and consideration to this matter.

Granted; and the Initial Pretrial Conference
will be rescheduled.

SO ORDERED:

12/27/2023

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted,

Law Office of Marc Scolnick P.C.

/s/ Marc Scolnick
Marc Scolnick, Esq.

Attorneys for Defendant – Essex Convenience Corp.

CC via ECF:

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